RECORDS CLASSIFICATION FORM FOR REGION V
RCRA RECORDS

Today's Date: 7/14/14

Site Name: 3M - MEDINA

ID Number: OHD 047736525

Date(s) of Documents: 11/19/2008

Type(s) of Document: PHOTOGRAPHS (PAPER & CD)

Quantity of Documents: No. of Box(es) _____ No. of Folder(s): _____

Sensitive: CBI Room _____ Enforcement Sensitive (Red Folder) _____

Documents can go to Federal Record Center: Yes X No ____
(Documents from FRC can be recalled in 48-72 hours)

Duplicates Returned to you: Yes ____ No X

Submitted by: BRENDA WHITNEY

Telephone Number: 3-4796

Comments: _____

3M Converter Markets

Performance Label Materials
1030 Lake Road
Medina Ohio 44256
800 422 8116 Office
877 722 5072 Fax
www.3M.com/converter

February 6, 2009

UPS NEXT DAY AIR

Ms. Brenda Whitney
United States Environmental Protection Agency, Region 5
77 West Jackson Boulevard, LR-8J
Chicago, Illinois 60604

Re: Notice of Violation
3M Medina
EPA ID# OHD047736525

Dear Ms. Whitney:

We received your letter dated January 6, 2009 on January 8, 2009. The letter summarized your facility inspection which took place on November 19, 2008. We have included the content of each finding from your letter followed by a detailed description of our corrective action in italics. Supporting documentation is included in attachments A through D.

1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste who accumulates hazardous waste in containers must mark each container with an accumulation start. See, OAC 3745-52-34(A)(2) [40 CFR § 262.34(a)(2)]. A generator may accumulate as much as 55 gallons of hazardous waste at or near any point of generation where wastes initially accumulates, which is under the control of the operator of the process generating the waste, without a permit or interim status and without marking the container with an accumulation start date provided that the generator complies with OAC 3745-52-34(C) [40 CFR § 262.34(c)(1)].

   At the time of the inspection, 3M was using at least two 10-gallon metal containers in the Conversion Room Warehouse (CRW) to accumulate rags laden with ethyl acetate at their respective points of generation. The rags in these containers were then consolidated in one 55-gallon drum labeled as "Hazardous Waste" with the F003, F005, and D001 waste numbers that is located outside the lab. This 55-gallon drum was not marked with an accumulation start date.

   Please note, that at the time of inspection, the drums were not satellite accumulation containers as asserted by 3M because they were neither at or near the point of generation, nor under the control of the operator of the process generating the waste.

Because the two 55-gallon drums mentioned above were not marked with accumulation start dates, 3M failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption.

3M Medina has removed the 55-gallon drum outside of the lab. The facility has created two additional hazardous waste storage areas within the plant for collection of wastes from satellite accumulation container. These areas each consist of a sealed drum, labeled correctly with a date. There is the required signage and adequate aisle space. These areas are inspected weekly and included in the facility's RCRA contingency plan. Attachment A is documentation of these areas.

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste who accumulates waste in containers at or near the point of generation and under the control of the operator must keep the container closed, except when it is necessary to add or remove waste. See, OAC 3745-52-34(C)(1)(a) [40 CFR §262.34(c)(1)(i)]. This condition is also a requirement of owners and operators of hazardous waste facilities that store containers of hazardous waste under OAC 3745-55-73(A) [40 CFR § 264.173(a)].

   At the time of the inspection, 3M was collecting hazardous waste blow down in a 5-gallon bucket from a compressor located in the Boiler Room that was not closed. Please note that at the time of inspection, waste was not being added or removed from this container. 3M, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption and violated the storage facility container requirement.

   3M Medina has evaluated the compressor blow down and has determined that the oil and water mixture is not a hazardous waste. The oil and water mixture from the 5-gallon pail is collected in a 55-gallon drum labeled used oil and water and is collected and recycled by Safety Kleen. Additionally, the 5-gallon container has been covered. Attachment B is documentation of this area..

3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must have a contingency plan for the facility. The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and this list must be kept up to date. Where more than one person is listed, one must be named as a primary emergency coordinator and the others must be listed in the order in which they will assume responsibility as alternates. See, OAC 3745-52-34(A)(4)[40 CFR §§ 262.34(a)(4)]. This condition is also a requirement of owners and operators of hazardous waste facilities under OAC 3745-54-52(D) [40 CFR § 264.52(d)].

   At the time of the inspection, Mark Clark was listed as the primary emergency coordinator; however, Mr. Clark left 3M in September, 2008. The contingency plan

did not list a current primary emergency coordinator. The plan did not contain an address for the alternate coordinator. 3M, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption and violated the hazardous waste facility contingency plan requirement.

3M Medina has reviewed and revised the facility's RCRA contingency plan to reflect the current primary and alternate emergency coordinators including names, addresses and phone numbers. The plan has also been revised to include the locations, descriptions and capabilities of the fire extinguishers and the carbon foam suppression system. In addition, the current plan has been sent to the required agencies. Attachment C is the current RCRA contingency plan for the facility and copies of the cover letters to the receiving agencies.

4. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must have a contingency plan for the facility. The plan must include a list of emergency equipment at the facility. The list must include the location and a physical description of each item and a brief outline of its capabilities. See, OAC 3745-52-34(A)(4)[40 CFR §§ 262.34(a)(4)]. This condition is also a requirement of owners and operators of hazardous waste facilities under OAC 3745-54-52(E) [40 CFR § 264.52(e)].

   At the time of the inspection, the 3M contingency plan included an incomplete list of emergency equipment. The plan did not include the locations, descriptions or capabilities of the fire extinguishers, the carbon foam suppression system, or any other emergency equipment provided at this facility with the exception of the spill control equipment. 3M, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption and violated the hazardous waste facility contingency plan requirement.

   Please see response to item 3.

5. A large quantity generator that accumulates hazardous waste on-site for 90 days or less and who does not meet the conditions for a permit exemption of OAC rules 3745-52-34(A), (C) [40 CFR § 262.34(a), (c)], is an operator of a hazardous waste storage facility, and is required to obtain an Ohio hazardous waste storage permit. See, OAC rules 3745-52-34(A), 3745-50-41(A), 3745-50-45(A) [40 CFR §§ 270.10(a), (d); 270.13].

   On failing to comply with the condition for a permit exemption referenced in items 1-4, above, 3M's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of OAC rules 3745-52-34(A), 3745-50-4] (A), and 3745-50-45(A).

   3M Medina understands that by correcting items one through four this item is satisfied and 3M Medina will not be applying for an Ohio hazardous waste storage permit.

If you have any questions regarding this submittal, please contact me at (330) 764-8840.

Sincerely,

Darryl Z. Vaci

Darryl Vaci
Plant Manager

Attachments:

Attachment A: Photos of new satellite accumulation areas
Attachment B: Photos of oil/water drums
Attachment C: RCRA Contingency Plan
Attachment D: MCD EHS-9004; Revised Hazardous Waste Checklist

ATTACHMENT A

3M Medina Hazardous Waste Satellite Accumulation Areas

Lab Area. Photo shows that satellite accumulation drum for lab waste is no longer in existence. Non-pumpable waste from lab now combined with coating non-pumpable waste.

Emulsion Coating Area – former satellite accumulation area now designated as Hazardous Waste Storage

Hazardous Waste Drum

Closeup of sign marking storage area

Finishing Department

Former satellite accumulation area not designated as hazardous waste storage area

Closeup of label on new hazardous waste drum, showing accumulation start date

ATTACHMENT B

Boiler Room

Waste oil drum in boiler room (drum on left)

Closeup of label on waste oil drum – no longer classified as hazardous waste

Blow down container – now covered

ATTACHMENT C

RCRA CONTINGENCY PLAN

3M Performance Label Materials
1030 Lake Road
Medina, Ohio 44256

24 HOUR TELEPHONE #: (651) 733-6100

U.S EPA IDENTIFICATION NO. OHD047736525

Plan Date: **May 2004**
Latest Revision: **January 2009**

Distribution

The following copies of this plan have been distributed and will be kept up to date:

Copy	Name/Address	Telephone #
1	Darryl Vaci 3M Medina 1030 Lake Road Medina, OH 44256	(330) 764-8840
2	Communications Supervisor City of Medina Police Dept 150 W Friendship Rd Medina, OH 44256	(330) 725-7777
3	City of Medina Fire Dept 300 West Reagan Parkway Medina, OH 44256	(330) 725-1772
4	Medina General Hospital Manager of Emergency Department 1000 East Washington Street Medina, OH 44256	(330) 336-1000
5	HMHTTC Response, Inc. 333 Littleton Road Suite 302 P.O. Box 5215 Parsippany, NJ 07054	(800) 927-9303

Note: Copies 1 is electronic, Copies 2-5 were sent as paper copies.

TABLE OF CONTENTS

LIST OF FIGURES AND TABLES

Scope

This document is the Resource Conservation and Recovery Act (RCRA) Emergency/Contingency Plan prepared pursuant to requirements under 40 CFR 262.34 (a) (4) with regard to 40 CFR 265 Subpart D. This plan contains procedures to minimize hazards to human health or the environment in the event of any release to the air, soil, or surface water of any hazardous wastes or spills, fires, and explosions.

A. GENERAL INFORMATION

1. The site is the 3M Performance Label Materials facility located in Medina, Ohio. The site is owned and operated by the 3M Company, St. Paul, Minnesota 55114. Facility location:

    a. 1030 Lake Road, Medina, Ohio 44256.

    b. The facility initially started operation under 3M ownership on August 1, 2002.

2. Facility Description:

    a. Located on 26 acres with one building (Refer to figure 1) of approximately 150,000 square feet under roof the 3M Medina organization employs over 100 people. The facility custom designs and manufactures pressure sensitive label products to meet specific customer requirements for various markets. This includes the determination of customer needs based on desired performance criteria and environmental application, pairing the correct adhesive/topcoat and film, and converting to desired width and length prior to shipment. The process utilizes solvents and flammable adhesives and generates some solvent waste and various other hazardous wastes.

    b. The plant consists of the following major components:
        i. Three Emulsion based coaters
        ii. One solvent based coater
        iii. One solvent based top coater
        iv. One rewind station
        v. Ten slitting/converting machines
        vi. A natural gas fired emergency generator and boiler
        vii. Three 12,000-gallon above ground storage tanks for water-based adhesives
        viii. A 25,000 gallon below ground spill containment tank; and
        ix. Regenerative Thermal Oxidizer (RTO)

B. SITE OPERATING CONDITIONS

1. The various processes and manufacturing at this site utilize solvents, organic, and inorganic chemicals which are supplied in 55-gallon drums, 275-gallon totes, and tank trucks (for storage in 12,000-gallon tanks). The accumulated wastes are shipped offsite in intervals of less than 90 days. All areas onsite utilize satellite accumulation.

2. Figure 1 indicates the location of the chemical storage areas for 55-gallon and tote quantities of flammable material as well as the hazardous waste storage areas. There are no floor drains adjacent to the chemical storage area.

3. Flammable storage cabinets are also utilized onsite which complies with NFPA and OSHA standards. The cabinets provide initial protection and containment in the event of a fire or a container leak.

C. SECURITY

1. There are three main entrances to the facility.
    - Employee Entrance – Shipping
    - Employee Entrance – Receiving
    - Main Entrance in the Front Office Lobby

2. All facility employees have an electronic pass, which allows access to the plant.

3. Visitors must check in with the Front Desk to gain access and will require an identification badge throughout the visit. All visitors will be required to watch the visitor safety video and sign a form stating they have viewed and understood the video. The form will be kept on file for one year.

D. PREPAREDNESS AND PREVENTION

Emergency systems and equipment located within the 3M Medina facility are as described in this section.

1. Emergency Exits

   Exterior emergency exits are located and identified throughout the facility.

2. Fire Extinguishing Systems

   - The Top Coater is protected by a Carbon Dioxide system.
   - The rest of the manufacturing floor is protected by a wet pipe sprinkler system.
   - A light water system protects the red label room and solvent handling room.

3. Fire Hydrants

   There are four fire hydrants located around the facility. Three have two, 2.5-inch and one 4-inch hose connections. The remaining hydrant has two, 2.5-inch hose connections. City water and pumps supply all hydrants.

4. Fire Extinguishers

   A variety of carbon dioxide, dry chemical and Foam extinguishers are located in all areas of the facility. Placement is dependant on the hazards present. The locations of these fire extinguishers are noted on the facility map. A list including a physical description and capabilities is included as Appendix D.

5. First Aid Stations

   First aid stations are located in the Coating Supervisor's office, in the Mailroom and outside the Shipping office. The contents are routinely inventoried and restocked.

6. Alarm Systems

   The fire alarms system is tied into the intercom so that when dialed, an audible alarm sounds in the facility and an alarm is also sent to an ADT central dispatch monitoring station. ADT will then contact emergency services and the facility to obtain more information about the emergency.

7. Emergency Communication System

   The overhead PA will be used as an emergency communication source to inform employees of an emergency in the facility. The PA system is tied into the ADT alarm system.

E. SITE EHS ENGINEER FUNCTIONS

The Site EHS Engineer will perform the following duties to maintain emergency preparedness:

1. Update the Contingency Plan. This plan must be reviewed and immediately amended, if necessary, whenever:

   a. Applicable regulations are revised
   b. The plan fails in an emergency
   c. The facility changes in its design, construction, operation, maintenance, or other circumstances, in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.
   d. The list of emergency coordinators changes.

e. The list of emergency equipment changes.

2. Ensure that the training is completed.

3. Ensure that all plant personnel are familiar with the emergency response procedures.

4. Coordinate the routine inspections and tests of communications or alarm systems, fire protection equipment, spill control, and clean up equipment to assure its proper operation in an emergency.

5. Insure that all-hazardous material and waste is inspected on a routine basis.

F. EMERGENCY COORDINATOR FUNCTIONS

1. The EHS Engineer is the designated primary emergency coordinator and must be contacted in the event of a hazardous materials spill or discharge. If the EHS Engineer is not available the Plant Engineering Supervisor or designate will assume this role.
2. The emergency coordinator is responsible for:
   a. Activating the alarm system as needed
   b. Requesting assistance from State and Local response agencies
   c. Preventing the spread or reoccurrence of explosions, fires or releases to other hazardous waste located in the facility
   d. Monitor for dangerous build-up of conditions due to emergency shutdown of equipment
   e. Ensuring recovered waste is properly treated and stored for disposal and it is not mixed with incompatible materials
   f. Verifying all emergency equipment is restocked, refilled and repositioned for future need prior to commencing operations
   g. Identifying the character, source, amount and extent of the release
   h. Assessing possible harm to humans considering both direct and indirect effects of the release, fire, explosion (e.g. the effects of any toxic, irritating, or asphyxiating gases that are generated or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).
   i. Determining if the release could threaten human health or the environment
   j. Communicating and recommending to authorities the area and extent of evacuations if needed and reporting such to the national Response Center or on-scene coordinator.

G. TRAINING

3M Medina is a RCRA generator. The following outlines our training program to meet RCRA generator training requirements.

1. Personnel to receive training:
   a. 3M Medina employees responsible for waste generation.
   b. Shipping personnel responsible for waste generation.
   c. Personnel listed on the emergency contact list.

2. Training will cover the areas listed below:
   a. Waste packaging with required Department of Transportation (DOT) containers.
   b. DOT waste descriptions and EPA/DOT required labels for waste containers.
   c. RCRA shipping manifests and records retention.
   d. Procedures for hazardous waste inspections and spill response.

3. Records will be maintained for the training program to show dates of training sessions and personnel attending.

G. EMERGENCY NOTIFICATION PROCEDURES:

1. The employee who first discovers an accidental discharge or and emergency situation will notify his/her supervisor or the EHS Engineer.

2. The following is the chain of notification that should be followed in an emergency situation:
   i. Person observing the emergency.
   ii. Supervisor or EHS Engineer
   iii. Plant Engineering
   iv. Plant Manager
   v. Local Emergency Response Organization (Fire, Hospital, etc,)
   vi. 3M Security (651-733-6100) who will contact 3M Environmental Engineering
   vii. State and Local Agencies as Required

3. The emergency coordinator will notify 3M Security in St. Paul at (651) 733-6100 as soon as possible. 3M Security will contact EH&SO personnel, who will notify appropriate environmental agencies, if warranted, and any other 3M staff groups, which should be involved. The Site EHS Engineer will notify the Medina Fire Department, of all fires and releases of hazardous materials to be in compliance with section 2.108 and 13.202 of the Uniform Fire Code. **Call 911 when requiring a response from the Fire Department. Refer to Table 2 – Section H.**

4. Evacuation of the facility is at the discretion of the Incident Commander. Evacuation procedures are listed in section E.

5. The notifier of the emergency should provide the following information:

   i. Name and telephone number of reporter.
   ii. Name and address of facility.
   iii. Time, place, and type of incident (release, fire, etc.)
   iv. Name and quantity of materials involved (to the extent known).
   v. Extent of injuries (if any).
   vi. Possible hazards to human health or the environment outside the facility.
   vii. Provide a telephone number that you can be reached at for the emergency in the event you get disconnected while on the phone.

H. EMERGENCY RESPONSE TELEPHONE NUMBERS:

Table 2. List of emergency response telephone numbers:

Table 2. List of Emergency Response Telephone Numbers	
National Response Center (EPA)	1-800-424-8802
Ohio EPA Emergency Reporting	1-800-282-9378 1-614-664-3020
United States EPA Region 5 (Chicago)	1- 800-621-8431
EPA RCRA Hotline (haz waste incidents)	1-800-424-9346
US DOT Hotline (Transportation Incidents)	202-366-4488
CHEMTREC	(800) 424-9300
Local Fire	911

Table 2. List of Emergency Response Telephone Numbers	
Local Police	911
Ambulance/Hospital	911
3M St. Paul Security	(651) 733-6100
Medina County Waste Water Treatment Plant	(330) 723-9585

I. EMERGENCY EVACUATION PROCEDURES:

1. Plant Evacuation: If an event occurs that presents an immediate threat to life and health a plant evacuation is required. Personnel must use the telephone PA system to dial "Intercom 6666" to sound the alarm which notifies ADT and the Fire Department. The alarm sounds within the plant and sounds like a shrill, repeating siren. The Supervisor on site should then dial "911" to confirm emergency services have been notified and give them any additional needed information. This includes total plant evacuation (such as a bomb threat or fire) and partial plant evacuation (i.e. discharge of carbon dioxide system on topcoater).
2. Employees will evacuate the facility and assemble at appropriate predetermined areas for a headcount. In the event of severe weather, employees will be moved to an area away from the emergency for shelter.
3. Emergency evacuation routes are posted throughout the facility. Employees should know the primary and a secondary route of exit from their area. Employees, contractors and visitors will meet on the south side of the parking lot in the appropriate area after evacuating. Primary evacuation routes are shown on the site map in Appendix A.
4. Area Supervisors are responsible for the headcount of employees in their area. Front desk personnel are responsible for accounting for visitors.
5. Employees are not to re-enter the building until given the "all clear" signal from the Supervisor on duty or the EHS Engineer.
6. Supervisors will contact management and report the incident in accordance with the Element 3.2 facility GSHP.

J. EMERGENCY RESPONSE PROCEDURES:

Under the direction of the Incident Commander the following general procedures will be followed:

1. Evaluation of Hazard.
    A. Health (Human, Livestock, and wildlife).
    B. Fire (Immediate and potential)
    C. Reactivity (Immediate and Potential)

    The evaluation of the hazard includes all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

2. Set priorities.
    A. Rescue: (Casualty/body recovery)
    B. Safety of rescue team (fire, contamination, and rupture. This includes constant hazard monitoring of the situation.)
    C. Needs at the time

D. Fire fighting
E. Recovery
F. Sealing off the area
G. Disposal (Per 3M Waste Management Procedures)

Spill/Chemical Release: **In the event of a chemical spill/release**:

- Small quantities of a known material: Area personnel will clean up small spills and notify their supervisor. A small quantity is defined as up to 1 gallon.
- Quantities greater than 1 gallon of a known material: Contact the Supervisor or the EHS Department to determine spill response.
- Any unknown material: Contact the Supervisor or the EHS Department to determine spill response.

If necessary the Supervisor will contact outside assistance for spill containment and/or clean up after Corporate Spill Response is called. The first call to report a spill should be to the 3M Security (651-733-6100).

3M Medina has corporate contracts with two firms that have local response teams. These agencies should be called after calling 3M Center Spill Response number. The caller should identify themselves as a 3M facility and identify situation. Corporate contract agencies are

- HMHTTC Response Incorporated: 1-800-927-9303
- Shaw (Environmental Emergency Response): 1-800-537-9540
  - Regional contacts include:
    - Dave Mummert (Findlay, OH) Work: 419-425-6129
    - Charlie Motier (Georgia) Work: 770-521-6569 Cell: Nonresponsive I

Supervisors will contact management and report the incident in accordance with the Element 3.2 facility Global Safety and Health Plan (GSHP).

Fire/Explosion: **If a fire or explosion has occurred**: Personnel must use the telephone PA system to dial "Intercom 6666" to sound the alarm and notify ADT. The Supervisor on site should then dial "911" to confirm the fire department has been notified and give them any additional needed information.

Supervisors will contact management and report the incident in accordance with the Element 3.2 facility GSHP

3. Implementation of the Contingency plan. The decision to implement the contingency plan depends on whether or not an imminent or actual incident could threaten human health or the environment. The purpose of this section is to provide guidance to the emergency coordinator in making this decision.

   The contingency plan will be implemented in the following situations:

   Fire and/or Explosions:

   1. A fire that causes the release of toxic fumes.
   2. After initial attempts to control a fire, the fire continues to spread.
   3. Use of fire suppressants results in contaminated runoff.
   4. An imminent danger of explosion exists that could ignite other materials, release toxic materials, or cause a safety hazard from flying fragments.

The Medina Fire Department will handle Fire Emergencies. Call 911 immediately. Incipient fire extinguisher use will only be utilized.

Spills or Material Release:

a. The spill caused the release of toxic vapors.
b. The spill cannot be contained on-site, or threatens to contaminate off-site soil and/or pollute groundwater or surface water.

4. In the event that a situation requires implementation of the Contingency Plan, the EHS Engineer will supervise the emergency response effort and will take steps to minimize the hazards to human health and the environment by the following:

a. Activate the internal facility alarms of the communication system to alert all affected site personnel. If necessary, the evacuation plan must be carried out.

b. Identify the character, exact source, amount, and the area of the released materials. Immediately establish the Exclusion Zone (contaminated area, Hot Zone), the Contamination Reduction Zone (decontamination zone, Warm Zone), and the support zone (Cold Zone).

c. Serve as the incident commander until termination process is complete or commander is transferred (to Medina Fire Department).

5. Termination of the incident will begin when:

1. The situation has been stabilized.
2. Emergency response activities have ended.
3. There is no longer a release or threatened release of a hazardous substance.
4. Clean up activities have begun.

6. Termination of the incident will include the following steps:

1. Declare the emergency over.
2. Decontaminate and restore emergency response equipment.
3. Documentation.
4. Debriefing.
5. Post incident analysis.
6. Critique
7. Write formal incident report

K. ARRANGEMENTS WITH LOCAL EMERGENCY RESPONSE CONTACT:

1. Police: A copy of this plan has been filed with the Medina Chief of Police.

A copy of the cover letter requesting the local police department to respond to 3M Medina emergencies is shown in Appendix C. Documentation of the police department's response or lack of response can be found in the Site EHS Records File.

2. Fire Department: A copy of this plan has been filed with the Medina Fire Department.

A copy of the cover letter requesting the local fire department to respond to 3M Medina emergencies is shown in Appendix C. Documentation of the fire department's response or lack of response can be found in the Site EHS Records File.

The local fire department is familiar with operations at this facility.

3. Hospital: A copy of this plan has been given to the Medina General Hospital Administrator.

A copy of the cover letter requesting the local hospital department respond to 3M Medina emergencies is shown in Appendix C. Documentation of the local hospital's response or lack of response can be found in the Site EHS Records File.

4. Emergency Responder Contractor: A copy of this plan has been given to HMHTTC Response, Inc.

A copy of the cover letter requesting the contractor to respond to 3M Medina emergencies is shown in Appendix C. Documentation of the contractor's response or lack of response can be found in the Site EHS Records File.

5. All spills, fires, and other emergencies are reported to 3M. Refer to section G of this plan for emergency notification procedures.

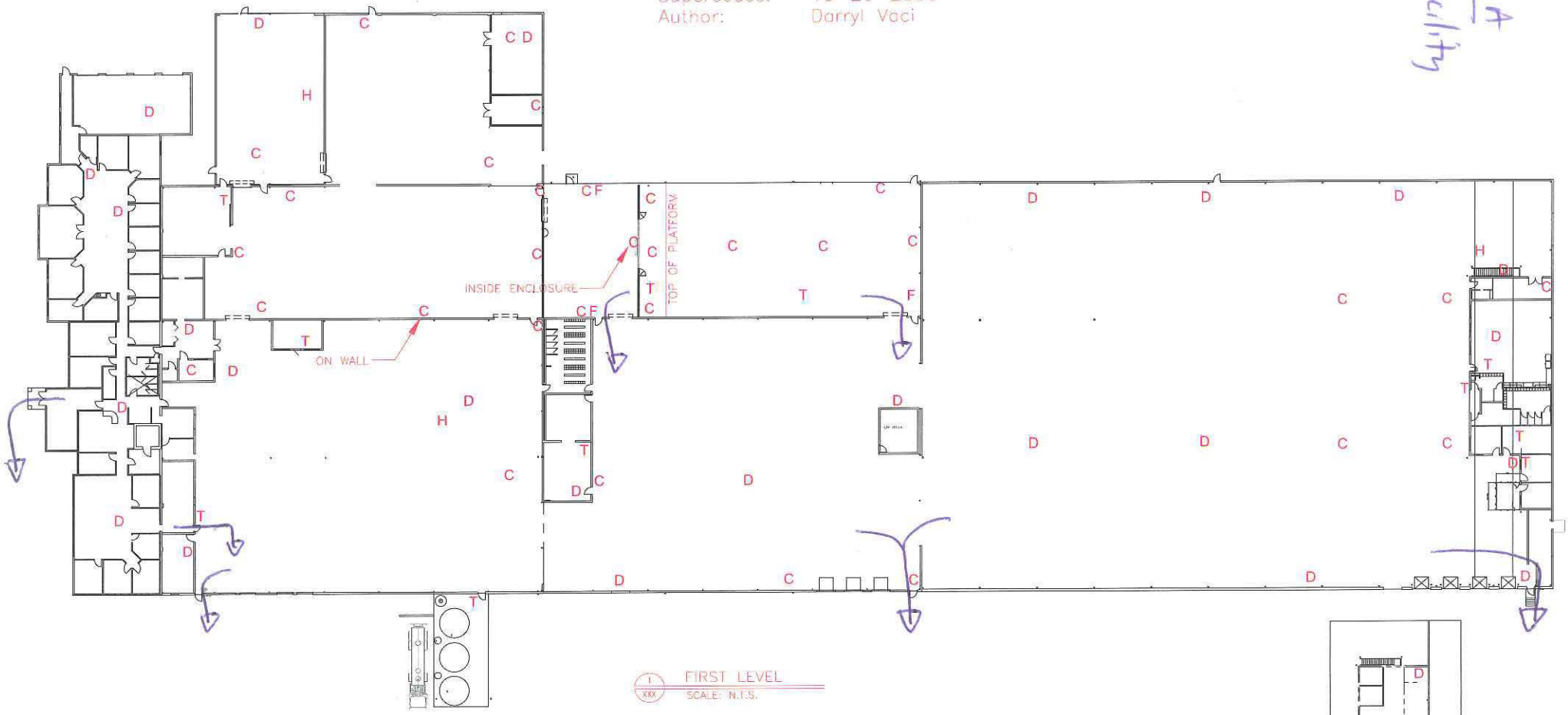
L. HAZARDOUS WASTE DESCRIPTION:

The waste stream profile system provides information concerning the waste and hazard classification, as well as instructions for packaging, labeling, and disposal of each waste stream. Appropriate labels are prepared and attached to containers before waste is first placed in the container. When the waste container is full, the container is properly closed and the accumulation start date is included on the label.

APPENDIX A
P of Facility

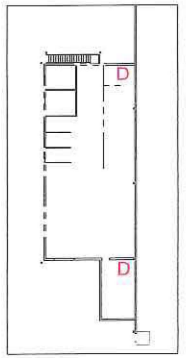
3M Medina

Effective Date: 02-05-2009
Supercedes: 10-29-2006
Author: Darryl Vaci



1 XXX FIRST LEVEL
SCALE: N.T.S.

PRIMARY EVACUATION ROUTE: ----------→
TELEPHONE: T
HAZARDOUS WASTE STORAGE AREAS: H
FIRE EXTINGUISHER:
C: CARBON DIOXIDE
F: FOAM
D: DRY CHEMICAL



2 XXX SECOND LEVEL
SCALE: N.T.S.

Appendix B
Site Evacuation Procedure

1. Plant Evacuation:

1.1. **If an event occurs that presents an immediate threat to life and health a plant evacuation is required.** Personnel must use the telephone PA system to dial "Intercom 6666" to sound the alarm and notify ADT. The Supervisor on site should then dial "911" to confirm emergency services have been notified and give them any additional needed information. This includes total plant evacuation (such as a bomb threat or fire) and partial plant evacuation (i.e. discharge of carbon dioxide system on topcoater).

1.2. Employees will evacuate the facility and assemble at appropriate predetermined areas for a headcount. In the event of severe weather, employees will be moved to an area away from the emergency for shelter.

1.3. In the event of severe weather, employees can assemble in the rear cafeteria in the Valspar facility that neighbors 3M Medina to the north. Valspar security should be contacted when an emergency evacuation is needed.

1.3.1. Valspar Security Phone: 330-721-2599

1.3.2. Valspar Security Mobile: Nonresponsive

1.4. Emergency evacuation routes are posted throughout the facility. Employees should know the primary and a secondary route of exit from their area. Employees, contractors and visitors will meet on the south side of the parking lot in the appropriate area after evacuating.

1.5. Area Supervisors are responsible for the headcount of employees in their area. Front Desk personnel are responsible for accounting for visitors.

1.6. Plant engineering and EHS departments will respond to all emergencies and will be in contact via use of radios.

1.6.1. In the event of an emergency alarm, all responders will switch to channel 4 on their radios to communicate with each other. In the event of a non-alarm emergency the EHS department will contact Plant Engineering employees on channel 3.

1.6.2. The first employee at the ADT control panel will be designated as the "Incident Commander" and will communicate information about the emergency.

1.6.3. Other responding employees will act as a "sweep team" to ensure all employees have evacuated the building and utility concerns have been addressed.

1.6.4. If no Plant Engineering employees or EHS Department personnel are on site, employee will evacuate the building and wait for emergency personnel to respond. Upon the notification of an emergency, the EHS Department must be notified immediately.

1.7. Employees are not to re-enter the building until given the "all clear" signal from the Supervisor on duty.

1.8. Supervisors will contact management and report the incident in accordance with the Element 3.2 facility GSHP.

Appendix C
Local Arrangement Letters

February 5, 2009

CERTIFIED MAIL

Communications Supervisor
Medina Police Department
132 North Elmwood Avenue
Medina, Ohio 44256

SUBJECT: Resource Conservation and Recovery Act (RCRA)
Emergency/Contingency Plan.
For 3M Medina

Dear Communications Supervisor:

The U.S. Environmental Protection Agency's (EPA's) Resource Conservation and Recovery Act (RCRA) requires the 3M Medina to have a site RCRA Emergency/Contingency Plan. Additional requirements of the Plan include providing a copy to and making arrangements with all local emergency response agencies, which may be called upon during the event of an emergency. Please review the attached Plan, complete and return the enclosed response form within 15 days to notify our facility as to whether or not you will be able to provide emergency services when and if needed. If we do not hear back from you, we will assume you are able to respond.

We appreciate your assistance in this matter and look forward to receiving the completed response form as well as any comments you may have on 3M's RCRA Emergency/Contingency Plan.

If you have any questions, contact me at (330) 764-8840.

Sincerely,

Darryl Vaci
Plant Manager

3M RCRA EMERGENCY/CONTINGENCY RESPONSE FORM

NAME OF RESPONDING SERVICE:

Communications Supervisor
Medina Police Department
132 North Elmwood Avenue
Medina, Ohio 44256

A RCRA Emergency/Contingency Plan for 3M Medina located at 1030 Lake Road, Medina, Ohio 44256, has been received at our offices. I have reviewed the plan and determined that:

_____We are able to provide emergency services if needed.

_____We will not be able to provide emergency services (please explain).

_____

_____

_____

_____

Person Responding: _____
Print Name

Person Responding: _____
Signature

Date: _____

Please return to: Darryl Vaci
3M Medina
1030 Lake Road
Medina, Ohio 44256

February 5, 2009

CERTIFIED MAIL

Medina Fire Department
132 North Elmwood Avenue
Medina, Ohio 44256

SUBJECT: Resource Conservation and Recovery Act (RCRA)
Emergency/Contingency Plan.
For 3M Medina

Dear Chief Painter:

The U.S. Environmental Protection Agency's (EPA's) Resource Conservation and Recovery Act (RCRA) requires the 3M Medina to have a site RCRA Emergency/Contingency Plan. Additional requirements of the Plan include providing a copy to and making arrangements with all local emergency response agencies, which may be called upon during the event of an emergency. Please review the attached Plan, complete and return the enclosed response form within 15 days to notify our facility as to whether or not you will be able to provide emergency services when and if needed. If we do not hear back from you, we will assume you are able to respond.

We appreciate your assistance in this matter and look forward to receiving the completed response form as well as any comments you may have on 3M's RCRA Emergency/Contingency Plan.

If you have any questions, contact me at (330) 764-8840.

Sincerely,

Darryl Vaci
Plant Manager

3M RCRA EMERGENCY/CONTINGENCY RESPONSE FORM

NAME OF RESPONDING SERVICE:

Medina Fire Department
132 North Elmwood Avenue
Medina, Ohio 44256

A RCRA Emergency/Contingency Plan for 3M Medina located at 1030 Lake Road, Medina, Ohio 44256, has been received at our offices. I have reviewed the plan and determined that:

_____We are able to provide emergency services if needed.

_____We will not be able to provide emergency services (please explain).

_____

_____

_____

_____

Person Responding: _____
Print Name

Person Responding: _____
Signature

Date: _____

Please return to: Darryl Vaci
3M Medina
1030 Lake Road
Medina, Ohio 44256

February 5, 2009

CERTIFIED MAIL

HMHTTC
333 Littleton Road
Suite 302
P.O. Box 5215
Parsippany, NJ 07054

SUBJECT: Resource Conservation and Recovery Act (RCRA)
Emergency/Contingency Plan.
For 3M Medina

To Whom It May Concern:

The U.S. Environmental Protection Agency's (EPA's) Resource Conservation and Recovery Act (RCRA) requires the 3M Medina to have a site RCRA Emergency/Contingency Plan. Additional requirements of the Plan include providing a copy to and making arrangements with all local emergency response agencies, which may be called upon during the event of an emergency. Please review the attached Plan, complete and return the enclosed response form within 15 days to notify our facility as to whether or not you will be able to provide emergency services when and if needed. If we do not hear back from you, we assume you are able to respond.

We appreciate your assistance in this matter and look forward to receiving the completed response form as well as any comments you may have on 3M's RCRA Emergency/Contingency Plan.

If you have any questions, contact me at (330) 764-8840.

Sincerely,

Darryl Vaci
Plant Manager

3M RCRA EMERGENCY/CONTINGENCY RESPONSE FORM

NAME OF RESPONDING SERVICE:

HMHTTC
333 Littleton Road
Suite 302
P.O. Box 5215
Parsippany, NJ 07054

A RCRA Emergency/Contingency Plan for 3M Medina located at 1030 Lake Road, Medina, Ohio 44256, has been received at our offices. I have reviewed the plan and determined that:

_____We are able to provide emergency services if needed.

_____We will not be able to provide emergency services (please explain).

_____

_____

_____

_____

Person Responding: _____
Print Name

Person Responding: _____
Signature

Date: _____

Please return to: Darryl Vaci
3M Medina
1030 Lake Road
Medina, Ohio 44256

February 5, 2009

CERTIFIED MAIL

Medina General Hospital
Manager of Emergency Department
100 East Washington Street
Medina, Oh 44256

SUBJECT: Resource Conservation and Recovery Act (RCRA)
Emergency/Contingency Plan.
For 3M Medina

The U.S. Environmental Protection Agency's (EPA's) Resource Conservation and Recovery Act (RCRA) requires the 3M Medina to have a site RCRA Emergency/Contingency Plan. Additional requirements of the Plan include providing a copy to and making arrangements with all local emergency response agencies, which may be called upon during the event of an emergency. Please review the attached Plan, complete and return the enclosed response form within 15 days to notify our facility as to whether or not you will be able to provide emergency services when and if needed. If we do not hear back from you, we assume you are able to respond.

We appreciate your assistance in this matter and look forward to receiving the completed response form as well as any comments you may have on 3M's RCRA Emergency/Contingency Plan.

If you have any questions, contact me at (330) 764-8840.

Sincerely,

Darryl Vaci
Plant Manager

3M RCRA EMERGENCY/CONTINGENCY RESPONSE FORM

NAME OF RESPONDING SERVICE:

Medina General Hospital
Manager of Emergency Department
100 East Washington Street
Medina, Oh 44256

A RCRA Emergency/Contingency Plan for 3M Medina located at 1030 Lake Road, Medina, Ohio 44256, has been received at our offices. I have reviewed the plan and determined that:

_____We are able to provide emergency services if needed.

_____We will not be able to provide emergency services (please explain).

_____

_____

_____

_____

Person Responding: _____
Print Name

Person Responding: _____
Signature

Date: _____

Please return to: Darryl Vaci
3M Medina
1030 Lake Road
Medina, Ohio 44256

Appendix D
Emergency Equipment List

Equipment	Number
Sprinkler Systems – See Section D for locations and descriptions	
Wet Pipe Sprinkler System	1
Carbon Dioxide Suppression System	1
Light Water Sprinkler System	1
Fire Extinguishers – See Appendix A for map location	
Carbon Dioxide – for use on flammable liquid or electric equipment fires (Class B and Class C fires)	30
Foam – water/foam mixture for use on flammable liquid fires (Class B fires)	3
Dry Chemical – general purpose extinguishers for use on all types of fires (Class A, B, and C fires)	26
External Fire Hydrants	4
Spill Kits	4
Internal Alarm System tied to Intercom and connected to external notification to ADT	1

Appendix E
Emergency Contact List

In the event of a spill or emergency, the following are to be notified immediately:

Name	Title	Organization	Home Phone	Home Address	Work Phone
Eric Rossetti	Spill Coordinator or Primary Emergency Coordinator	3M – Medina	Nonresponsive	Nonresponsive Nonresponsive	(330) 764-8869
Darryl Vaci	Plant Manager or Secondary Emergency Coordinator	3M – Medina	Nonresponsive	Nonresponsive I. Nonresponsive Nonresponsive	(330) 764-8840
3M Security*	---	3M Corporate Security	---	St. Paul, MN	(651) 733-6100

ATTACHMENT D
Hazardous Waste Inspection Sheeet

JAN □ FEB □ MAR □ APR □ MAY □ JUN □
JUL □ AUG □ SEP □ OCT □ NOV □ DEC □

2009 □ 2010 □ 2011 □

	WEEK 1		WEEK 2		WEEK 3		WEEK 4		WEEK 5	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Red Label Room (RLR)										
Signs posted & readable										
Adequate aisle space										
Waste segregated from other materials (entire red label room is the HW storage)										
Incompatible waste segregated from one another										
Good housekeeping										
No spillage or leakage										
Good pallets										
Containers										
Not damaged, bulging or badly rusted										
No leakage										
Clean; no contamination										
Lids clean										
Labels complete and visible (accumulation date indicated)										
Containers properly closed/sealed										
All stored less than 90 days										
Secondary Containment										
Surface impervious (no cracks etc in floor)										
Emergency Response Equipment										
Spill control and PPE available/in usable condition (verify spill kit is in designated location, seal intact)										
Fire extinguishers or sprinkler present										
Boiler Room										
55-gal drum of oil on a containment pallet, sealed and not leaking										
Satellite Accum. Drum labeled w/o date, lid latched. All used oil to be taken directly to Satellite drum, do not leave open or unattended.										
E2/E3/Lab Hazwaste Storage Drum										
Drum labeled w/ accumulation date, lid latched, less than 90 days										
Adequate aisle space; good housekeeping										
Signs posted and readable										
Finishing Hazwaste Storage Drum										
Drum labeled w/ accumulation date, lid latched, less than 90 days										
Adequate aisle space; good housekeeping										
Signs posted and readable										
Inspector Initials/Date:										

Land and Chemicals Division
RCRA Branch
Inspection Letter Signoff

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☑ Return to Compliance

Facility Name: 3M – Performance Label Materials
Location: 1030 Lake Road
Medina, Ohio 44256
EPA Id: OHD047736525
Assigned Staff: Brenda Whitney **Phone:** 312-353-4796

Name	Signature	Date
Author Brenda Whitney	Brenda Whitney	3-2-09
Regional Counsel N/A		
Section Chief Paul Little	PL	3/2/09
Branch Chief Willie Harris	Willie H. Harris	3/2/09

Directions/Request for Clerical Support:
After the Section Chief signs this sheet and original letter:
1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file; and
   - One copy for the official file; Note: original inspection report goes into file room.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Daryl Vaci, Plant Manager
3M- Performance Label Materials
103[illegible] Lake Road
Me[illegible]a, Ohio 44256

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: USA KUESTA
B. Date of Delivery: 3/16/09

C. Signature
X Olga Kuesta
☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7001 0320 0005 8915 6623

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 04 2009

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Daryl Vaci
Plant Manager
3M – Performance Label Materials
1030 Lake Road
Medina, Ohio 44256

Re: 3M – Performance Label Materials
EPA I.D. No.: OHD047736525

Dear Mr. Vaci:

On November 19, 2008, representatives of the U.S. Environmental Protection Agency and the Ohio Environmental Protection Agency inspected the 3M – Performance Label Materials facility located in Medina, Ohio. In response to violations of the Ohio Administrative Code and the United States Code of Federal Regulations identified during the inspection, a Notice of Violation was issued to you on January 6, 2009. Subsequent to the Notice of Violation, you submitted written information regarding the identified violations in correspondence dated February 6, 2009.

This letter is to inform you that EPA has reviewed the referenced response and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the OEPA will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Brenda Whitney, of my staff, at 312-353-4796.

Sincerely,

Willie H. Harris

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

cc: Kris Coder – OEPA, NEDO

Land and Chemicals Division
RCRA Branch
Inspection Letter Signoff

Type of Document:
- [X] Notice of Violation and Inspection Report/Checklist
- [ ] No Violation Letter and Inspection Report/Checklist
- [ ] Letter of Acknowledgment
- [ ] Information Request
- [ ] Return to Compliance

Facility Name: 3M-Medina
Location: 1030 Lake Road
Medina, Ohio 44256
EPA Id: OHD047736525
Assigned Staff: Brenda Whitney **Phone:** 312-353-4796

Name	Signature	Date
Author Brenda Whitney	Brenda Whitney	12/29/08
Regional Counsel Tamara Carnovsky	T Carnovsky	12/29/08
Section Chief Paul Little	Mark Bethke for P. Little	12-30-08
Branch Chief Willie Harris	Willie R. Harris	12/31/08

Directions/Request for Clerical Support:
After the Section Chief signs this sheet and original letter:
1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file; and
   - One copy for the official file; Note: original inspection report goes into file room.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Darryl Vaci
Plant Manager
3M Medina
1030 Lake Road
Medina, OH 44256

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: Lynette Fischbach
B. Date of Delivery: 1-8-09

C. Signature
X [signature]
☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7001 0320 0005 8922 4773

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 0 6 2009

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Darryl Vaci
Plant Manager
3M Medina
1030 Lake Road
Medina, Ohio 44256

Re: Notice of Violation
3M Medina
EPA ID #: OHD047736525

Dear Mr. Vaci:

On November 19, 2008, representatives of the U. S. Environmental Protection Agency and Ohio Environmental Protection Agency (OEPA) inspected the 3M Medina facility ("3M" or "Facility") located in Medina, Ohio. The purpose of the inspection was to evaluate 3M's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by 3M personnel, a review of records, and physical observations made by the inspector at the time of the investigation, EPA has determined that 3M is engaged in the storage of hazardous waste without a permit, and is in violation of certain requirements of the Ohio Administrative Code (OAC) and United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage permit, 3M must be in compliance with the conditions of OAC 3745-52-34(A) and (C) [40 CFR § 262.34(a) and (c)]. We find 3M is in noncompliance with the following conditions for a storage permit exemption and is in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste who accumulates hazardous waste in containers must mark each container with an accumulation start. See, OAC 3745-52-34(A)(2) [40 CFR § 262.34(a)(2)]. A generator may accumulate as much as 55 gallons of hazardous waste at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without marking the container with an accumulation start date provided that the generator complies with OAC 3745-52-34(C) [40 CFR § 262.34(c)(1)].

At the time of the inspection, 3M was using at least two 10-gallon metal containers in the Conversion Room Warehouse (CRW) to accumulate rags laden with ethyl acetate at their respective points of generation. The rags in these containers were then consolidated in one 55-gallon drum labeled as "Hazardous Waste," and marked with the F003, F005, D001, and D035 hazardous waste numbers that was located in the northeast corner of the CRW. This 55-gallon drum was not marked with an accumulation start date.

Also at the time of the inspection, the Facility Lab was using a 15 to 20-gallon metal container to collect various materials contaminated with solvents. When full, the container is emptied into a 55-gallon drum labeled as "Hazardous Waste" with the F003, F005, and D001 waste numbers that is located outside the lab. This 55-gallon drum was not marked with an accumulation start date.

Please note, that at the time of inspection, the drums were not satellite accumulation containers as asserted by 3M because they were neither at or near the point of generation, nor under the control of the operator of the process generating the waste.

Because the two 55-gallon drums mentioned above were not marked with accumulation start dates, 3M failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption.

2 In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste who accumulates waste in containers at or near the point of generation and under the control of the operator must keep the container closed, except when it is necessary to add or remove waste. See, OAC 3745-52-34(C)(1)(a) [40 CFR § 262.34(c)(1)(i)]. This condition is also a requirement of owners and operators of hazardous waste facilities that store containers of hazardous waste under OAC 3745-55-73(A) [40 CFR § 264.173(a)].

At the time of the inspection, 3M was collecting hazardous waste blow down in a 5-gallon bucket from a compressor located in the Boiler Room that was not closed. Please note that at the time of inspection, waste was not being added or removed from this container. 3M, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption and violated the storage facility container requirement.

3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must have a contingency plan for the facility. The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and this list must be kept up to date. Where more than one person is listed, one must be named as a primary emergency coordinator and the others must be listed in the order in which they will assume responsibility as alternates. See, OAC 3745-52-34(A)(4)[40 CFR §§ 262.34(a)(4)]. This condition is also a requirement of owners and operators of hazardous waste facilities under OAC 3745-54-52(D) [40 CFR § 264.52(d)].

At the time of the inspection, Mark Clark was listed as the primary emergency coordinator; however, Mr. Clark left 3M in September, 2008. The contingency plan did not list a current primary emergency coordinator. The plan did not contain an address for the alternate coordinator. 3M, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption and violated the hazardous waste facility contingency plan requirement.

4. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must have a contingency plan for the facility. The plan must include a list of emergency equipment at the facility. The list must include the location and a physical description of each item and a brief outline of its capabilities. See, OAC 3745-52-34(A)(4)[40 CFR §§ 262.34(a)(4)]. This condition is also a requirement of owners and operators of hazardous waste facilities under OAC 3745-54-52(E) [40 CFR § 264.52(e)].

   At the time of the inspection, the 3M contingency plan included an incomplete list of emergency equipment. The plan did not include the locations, descriptions or capabilities of the fire extinguishers, the carbon foam suppression system, or any other emergency equipment provided at this facility with the exception of the spill control equipment. 3M, therefore, failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption and violated the hazardous waste facility contingency plan requirement.

5. A large quantity generator that accumulates hazardous waste on-site for 90 days or less and who does not meet the conditions for a permit exemption of OAC rules 3745-52-34(A), (C) [40 CFR § 262.34(a), (c)], is an operator of a hazardous waste storage facility, and is required to obtain an Ohio hazardous waste storage permit. See, OAC rules 3745-52-34(A), 3745-50-41(A), 3745-50-45(A) [40 CFR §§ 270.1(c); 270.10(a), (d); 270.13].

   On failing to comply with the condition for a permit exemption referenced in items 1-4, above, 3M's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of OAC rules 3745-52-34(A), 3745-50-41(A), and 3745-50-45(A).

At this time, EPA is not requiring 3M to apply for a storage permit so long as 3M immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Brenda Whitney, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Whitney of my staff at (312) 353-4796.

Sincerely,

Willie H. Harris

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Kris Coder, OEPA - NEDO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	November 19, 2008
Facility Name:	3M Medina
Facility Address:	1030 Lake Road Medina, Ohio 44256
EPA RCRA ID Number:	OHD047736525
Generator Status:	Large Quantity Generator
Facility Contact:	Darryl Vaci - Plant Manager
U.S. EPA RCRA Inspector:	Brenda Whitney - Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division
Prepared By:	Brenda Whitney – Environmental Engineer
Date Completed:	12/05/08 Month / Day / Year
Accepted By:	for Paul Little – Chief, Compliance Section 2
Date Accepted:	12/08/08 Month / Day / Year

Purpose of Inspection

An unannounced EPA-lead Compliance Evaluation Inspection (CEI) of 3M Medina ("3M" or "Facility") located at 1030 Lake Road in Medina, Ohio, took place on November 19, 2008. This CEI was an evaluation of 3M's compliance with the RCRA hazardous waste regulations codified at the authorized Ohio Administrative Code and the Code of Federal Regulations. I conducted a Large Quantity Generator inspection. The following people were present for part or all of this inspection:

Darryl Vaci - Plant Manager	3M
Dean Hartzler – Technician	3M
Kris Coder - Environmental Specialist	OEPA
Brenda Whitney – Environmental Engineer	EPA

Ms. Whitney and Mr. Coder displayed official credentials and identification to Facility personnel upon arrival. During an introductory briefing, the purpose and logistics of the inspection were delineated and permission for the inspectors to take photographs in the plant was granted by Mr. Vaci. In order for photographs to be allowed, Mr. Hartzler was assigned to accompany the inspection and take air volatility measurements in potential ignition zones.

Site Description

The following information about 3M is based on the personal observations of the EPA and on representations made during the inspection by the Facility personnel identified above or within the text.

The 3M Facility was constructed in 1967. Emtech was the most recent occupant of the space until it was acquired by 3M in 2002. Until recently, 3M had maintained the Emtech brand name for recognition purposes. The cross-over to the 3M name had been fully implemented at the time of the inspection. Approximately 125 people are employed at this Facility. Employees work either two shifts five days a week or three shifts seven days a week depending on job duties. The Facility has an under roof area of 150,000ft^2 and rests on 26 acres of land.

The main process at this Facility is the manufacture of base label stock. Of five production lines, three are water-based emulsion lines, whereas the remaining two are solvent-based lines. One solvent line is strictly a top-coating line used on only 10% of the product.

Rolls of paper and film, as well as drums and totes of wet chemicals and adhesives, are brought to the Facility as raw materials. The coating operations on the base stock are different respective to the type of paper and film that are used, such as silicone-coated liners. All processes require ovens for drying wet applications. Water-based processes are vented to the ambient air and solvent-based processes are vented to a regenerative thermal oxidizer (RTO). The base layer of stock, on which most of the chemistry is applied, is then laminated with face stock. The finished

rolls of labels are cut to customer size and are packaged for shipping. The slitters, which are used to cut the finished rolls, are periodically wiped down with solvent. Wipes used for cleaning equipment are discarded, not laundered.

The hazardous wastes generated at the facility include liquid wastes from the solvent-based operations and non-liquid waste, such as wipes and personal protective equipement, contaminated with solvent. The solvent used for manual wipe downs of the water-based process lines and the slitters is 100% ethyl acetate. Solvents used on the solvent-based lines include MEK (100%) and, less often, small quantities of iso-propyl alcohol and heptane.

All waste, hazardous and non-hazardous, generated at the Facility is managed at the 3M-owned and operated treatment, storage, and disposal (incinerator) Facility in Cottage Grove, Minnesota.

Site Tour

Before entering the production area, in order to prevent static discharges, the inspectors had to be tested for grounding. Neither inspector was wearing shoes that provided grounding, so they were given grounding straps to be attached to their boots.

The tour began near the offices on the northwest side of the Facility in the Maintenance Area. Aerosol cans are used in this area. When the cans are emptied or are no longer useful they are taken for storage in a central location elsewhere in the Facility. The cans are neither punctured nor drained and are managed as hazardous waste with the D001 hazardous waste code. A cardboard box of lead calcium batteries was on a workbench in this area (See Appendix A: Picture 1). The box was labeled as "Scrap Batteries." A 5-gallon bucket on a shelf below the batteries contained "Used Lighting Ballast."

The Red Label Room (RLR) is located north of the Maintenance Area. The RLR moniker describes the red DOT label for flammable materials. The RLR is used as a raw material storage area and as the Facilty 90-day hazardous waste accumulation area (HWAA). A spill kit for the room is located just outside of the entrance door. Telephones are also located near the entrance and portable fire extinguishers are inside the room. Dave Drummond, the person who deals most closely with the hazardous waste at the Facility was in the HWAA when we arrived. Mr. Drummond explained that roughly 10-12 pallets each of hazardous and non-hazardous waste is shipped out approximately once per month. A waste round-up occurs every quarter. Any material that hadn't gotten shipped out gets removed at that time.

At the time of the inspection, there were forty-one 55-gallon drums of hazardous waste in the HWAA (See Appendix A: Picture 2). Each drum was closed, marked as "Hazardous Waste," and marked with an accumulation start date. The dates on the drums ranged from 10/09/08 to 11/18/08. One 55-gallon drum in the area was marked as a carcinogen and was being profiled by 3M in Minnesota. Another 55-gallon drum was in an over-pack container. A product drum that they had received from an adhesive manufacturer had been leaking. The material was being stored in the HWAA, but it was still a raw material. The room has a blowout wall on the north end. Ignitable materials are stored more than fifty feet from the property line. A parking lot is on the other side of the north wall. The floor of the room is sloped to trenches which lead to an

underground containment tank outside near the RTO. The containment can hold the contents of the largest container (330-gallon tote) in the Facility as well as 30 minutes of sprinkler water.

The top-coat line ("TC") and one emulsion line ("E-1") are located just southeast of the RLR. The TC is a solvent-based process line. Two 55-gallon drums are used to collect waste in this area. One drum collects non-pumpable material. This drum was clamped closed and was labeled as "Hazardous Waste" containing MEK and heptane. The second 55-gallon drum was located further up the line and was used to collect pumpable waste. The drum was closed with a burpless funnel and marked with the words "Hazardous Waste" also containing MEK and heptane.

The water-based emulsion line E-1 was located just north of TC. One 5-gallon satellite container was positioned near this line to collect rags contaminated with ethyl acetate, which had been used to wipe down the equipment after a cleaning with soapy water. The non-pumpable material generated at this line was collected in a 55-gallon drum as non-hazardous waste.

North of TC and E-1, and east of RLR is the non-hazardous waste and water-based raw material storage area. At the time of the inspection, eighteen pallets of non-hazardous waste were staged for shipment.

The Boiler Room is located in the northeast corner of the non-hazardous waste storage area. An oil/water separator is in the room. A 5-gallon bucket for collecting oil from the separator was empty. A second 5-gallon bucket was being used as a collection spot for "Waste Blow Off" from compressors. The bucket was not closed or otherwise marked. The oil that is collected in both buckets is consolidated in a 55-gallon drum, which was located five feet from either bucket and was labeled as "Waste Oil." The drum was also labeled as "Hazardous Waste" with the D001 waste number and marked with a DOT "Flammable Liquid 3" sticker. The oil that is collected in this area is minimal and is not sent for recycling. Any waste oil generated on-site is managed as a hazardous waste.

The Solution Handling Room is designated for the handling of solvents and wet chemicals for the S-1 Coater (S-1). Solvent is used when changing the dies, which are used for the even distribution of adhesive on the paper, and for any other clean-up work on this apparatus. Two 55-gallon drums of hazardous waste were located in this area. The first drum was used to collect non-pumpable materials such as rags and personal protective equipment. The drum was closed and labeled as "Hazardous Waste." The second 55-gallon drum was collecting spent solvent. This drum was in use at the time of the inspection and the lid on the drum funnel was held open by an inserted hose. The drum was labeled as "Hazardous Waste." A third container, a red 5-gallon bucket, was being used to collect spent aerosol cans. The bucket was labeled as "Hazardous Waste" with the D001 waste number. All three containers were managed as satellites.

The solvent chemistry for S-1 is confined to the Solution Handling Room. The majority of the line extends into the next room. The adhesive coated web travels through an oven, steamer, and laminator. Near the lamination operation, was a 5-gallon metal satellite container for rags contaminated with MEK. The container was marked as "Hazardous Waste" and was closed.

While the drying units for the emulsion coating lines are vented to the ambient air, the oven for S-1 is vented to a regenerative thermal oxidizer (RTO). The RTO may be described as a self-sustaining unit. The unit contains two beds of ceramic media. In start-up, hot air is pumped through the first bed of media to burn off solvents. The hot air from the combustion chamber is used to heat up the second bed of media. When the second bed is hot, the solvent fumes are diverted to that bed and the heat from the combustion chamber is used to, again, warm up the first bed. The cycle continues from that point until the unit is shut down and restarted. The ceramic media have not been discarded since 3M initiated operation of the unit approximately four years prior to this inspection. Mr. Vaci stated that the media would be characterized in the event it is discarded.

The Conversion Room Warehouse (CRW) on the east side of the property makes up approximately one-third of the Facility. Eleven slitters, which are used to cut the jumbo rolls to customer-specified widths, are located in this area. A 55-gallon satellite accumulation container for aerosol cans was located near a slitter on the south east side of the area. The drum was closed and labeled as "Hazardous Waste" with the D001 hazardous waste number. North of the 55-gallon drum was a 10-gallon satellite container for rags contaminated with ethyl acetate. The slitters must be manually wiped down because of adhesive buildup. The container was closed and labeled as "Hazardous Waste" with the F003 hazardous waste number. West of the 10-gallon rags container, near a different slitter, was another 10-gallon satellite container for rags contaminated with ethyl acetate. The container was closed and was marked as "Hazardous Waste" with the F003 waste number.

In the far northeast corner of the CRW was a 55-gallon drum that was being used as a consolidation drum for the 10-gallon satellite containers of rags stationed throughout the CRW (See Appendix A: Picture 3). The container was closed, labeled as "Hazardous Waste," and marked with the F003, F005, D001, and D035 hazardous waste numbers. The drum, however, was not dated. Mr. Vaci stated that 3M had been managing the drum as a satellite container.

Fluorescent lamps were kept in a janitorial closet near the northeast corner of the CRW. Two boxes of 8-foot lamps and one box of 4-foot lamps were marked with the words "Fluorescent Lamp Recycling Boxes." The boxes were closed and were in good condition. The lamps are recycled through Waste Management, Inc., which recently acquired the lamp recycling division of Mercury Waste Solutions, Inc.

The Facility Lab is located south of the Solution Handling Room in the middle of the Facility. The Lab technicians test adhesive properties and other label specifications. Inside the lab, one approximately 15-gallon can of hazardous waste was being used as a satellite accumulation container. The can was closed and marked with the words "Hazardous Waste" with the F003, F005, D001, and D035 waste numbers. Waste in this container is taken outside of the Lab to accumulate in a 55-gallon drum. This drum was closed and was labeled as "Hazardous Waste" with the F003, F005, and D001 waste numbers (See Appendix A: Picture 4). This drum was managed as a satellite accumulation container and was not marked with a start date of accumulation.

Emulsion lines two and three ("E-2" and "E-3") are located just west of the Lab. Both lines are identical to one another. A 10-gallon satellite container for non-pumpable cleaning materials

contaminated with ethyl acetate is located next to each line. Both containers were closed and labeled as "Hazardous Waste." The contents of both containers are consolidated in one central 55-gallon drum that is less than 20 feet from, and within sight of, either satellite. The 55-gallon drum was closed and labeled as "Hazardous Waste" with the F003, F005, D001, and D035 waste numbers. Pumpable waste from the emulsion lines was collecting in a 55-gallon drum labeled as non-hazardous waste.

End of Tour

Records and Emergency Preparedness Review

Preparedness and Prevention: The Facility is equipped with a public announcement and alarm system. Telephones with public announcement and external calling capabilites are available throughout the Facility. One phone is located immediately outside of the Facility HWAA. Portable fire extinguishers are placed throughout the Facility. A foam fire suppression system has been installed in the RLR, the Solution Handling Room, and the room that houses S-1. Spill kits and overpack drums are located in the Receiving Area, outside of the RLR, near the S-1 oven, and in the Shipping Department. The majority of the facility is sprinkled, except for the areas in which the foam suppressant system is located. Aisle space is limited between the pallets of drums that are stored in the RLR. Labels have been placed both on the sides and tops of the 55-gallon drums. Assessing the condition of the drums in the second row against the wall is difficult, though not impossible. Arrangements with local authorities, as listed under the Contingency Plan section below, have been made.

Contingency Plan: The Facility Emergency Action Plan, as the contingency plan is named, was last updated on 10/29/2006. The plan describes the actions that are to be taken in the event of a spill or chemical release. In the event of a spill, a supervisor would contact the 3M Corporate Spill response center and then one of two local response agencies - either Shaw or HMHTTC Response Incorporated. In the event of a fire or if a plant evactuation were required, alarms are actuated by dialing "Intercom 6666" on the telephone public announcement system. Alarms are managed by ADT, which alerts local emergency responders such as the Medina Fire and Police Departments as well as with Medina General Hospital. An evacuation plan is delineated with primary and secondary routes and signals for total or partial plant evacuations. Emergency Coordinators are listed in the plan. Mark Clark, who is listed as the Primary Emergency coordinator, however, left the Facility two months prior to the inspection. Mr. Vaci is listed as the Secondary Emergency Coordinator. Mr. Vaci's home and office phone numbers are included in the list, but addresses are not included. 3M security is also on the list. An Emergency Equipment list is also included in the plan. The list however, is incomplete as it discusses only spill control equipment but does not mention fire extinguishers, the carbon foam suppression system, or any other emergency equipment provided at this Facility.

Training: An annual training class for all employees at the Facility includes a review of the Facility Emergency Action Plan. The training topics include inspection schedules for emergency equipment, communications and alarm systems, responses to fires and

explosions, and shutdown of operations in the event of an emergency. The most recent training was held on September 3, 2008. Mr. Vaci, as the Emergency Coordinator, and Mr. Dave Drummond, as the person responsible for handling the hazardous waste in the HWAA and for signing manifests, attended this training, which was conducted by the former Environmental, Health, and Safety Manager Mark Clark.

Manifests: Upon inspection, manifests appear to be complete and are maintained at the Facility for at least three years. Waste is shipped off-site every 4-6 weeks. All waste is transported and accepted by an arm of corporate 3M (EPA ID number: MND006172969). No alternate TSDF was listed on the manifests. If the waste is rejected, it must return back to the generator. An incident of this type has not occurred. Applicable LDR forms were available for review. Batteries and Lamps were last sent off-site for reclamation on 5/01/08.

Inspections: Inspections are performed in the Facility HWAA on a weekly basis. On rare occasions, inspections were conducted anywhere between 7 and 13 days apart, which is greater than the required 7-day period. Two 55-gallon drums were identified as 90-day containers during the inspection. These drums were not included in the inspection schedule because 3M had considered those drums to be satellite accumulation containers.

Waste Profiles: Waste determinations are completed using generator knowledge. MSDSs are available at the Facility. Each waste is assigned a profile number, which is also written on the hazardous waste manifests for tracking purposes. When a new waste is generated through a special trial, the waste is profiled by 3M in Minnesota and may be held as a hazardous waste until a decision is made.

Waste Minimization Plan: 3M has an elaborate waste minimization system that is corporate wide. Some of the efforts being made include using an RTO, which, after initial start-up, runs without additional use of resources. Packing materials are reused by the DuPont Corporation. The Facility is ISO14001 certified, which requires a waste minimization element. A Pollution Prevention Pays (3-P) program is in place as is an Environmental Target – 2010 (ET-10) program which sets a target of a 25% reduction in the pounds of volatile organic compounds emitted per pound shipped.

Closing Conference

The following items were discussed with 3M personnel at the close of the inspection.

- As a general statement, satellite accumulation areas cannot be consolidated into one central accumulation container unless that container is a 90-day container.
- The contingency plan needs to be amended since the departure of Mark Clark, the primary Emergency Coordinator. A full review of the plan would take place at the EPA office.
- Benzene (D018) appears on manifests, most recently on 10/15/08, and is also marked on several of the hazardous waste containers at the site. No explanation for the benzene in the solvent waste was given during the inspection.

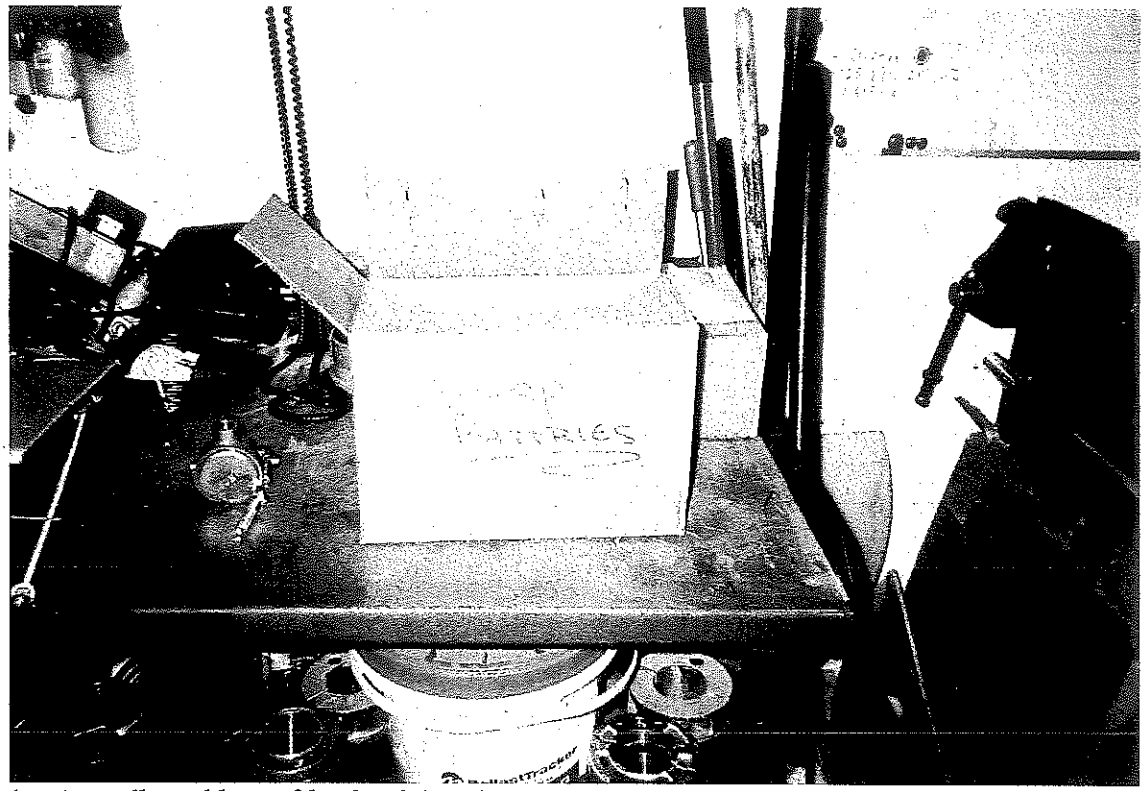
Appendix A

PHOTO LOG

Inspection Date:
November 19, 2008

Facility Name, Address, and EPA ID #:
3M Medina
1030 Lake Road
Medina, Ohio 44256
OHD047736525

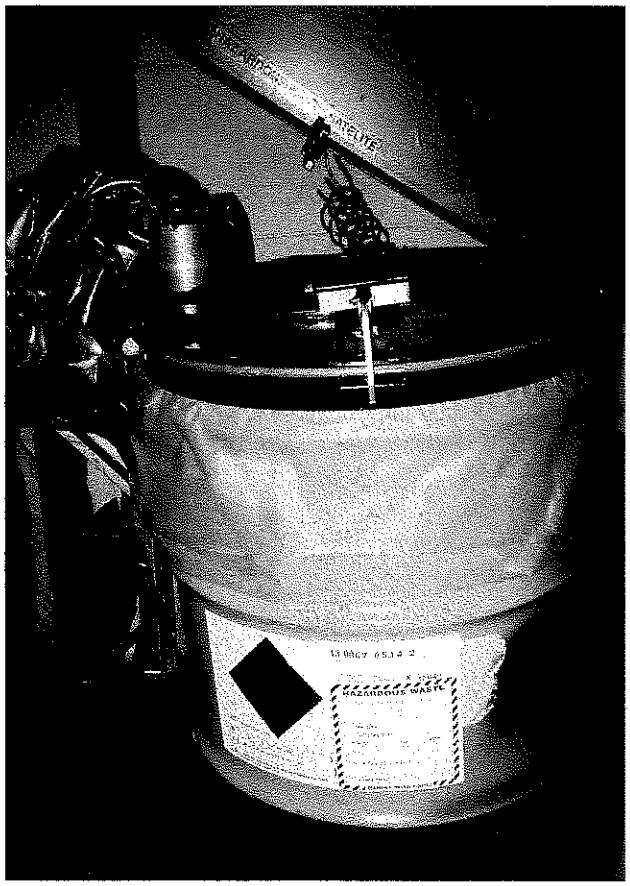
Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division



Picture 1 – A cardboard box of lead-calcium batteries was on a workbench in the Maintenance Area. A 5-gallon bucket on the shelf below the box contained lighting ballast.

Picture 2 – At the time of the Inspection, forty-one 55-gallon drums were accumulating in the hazardous waste accumulation area (HWAA). Each drum was closed, marked as "Hazardous Waste," and dated with an accumulation start date.

Picture 3 – A 55-gallon container was being used as a consolidation drum for rags generated in the Conversion Room Warehouse. The container was closed, labeled as "Hazardous Waste," and marked with hazardous waste numbers. The drum was not marked with an accumulation start date.



Picture 4 – This 55-gallon drum is located outside of the Facility Lab. The waste accumulates inside the lab in a smaller container then is brought to this drum for further accumulation. The drum was closed and marked as "Hazardous Waste," but it was not marked with an accumulation start date.

3M - Medina

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO

Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt**

CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	Waste Determination	Determination Not Needed	Determination Needed

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Applicable, NI=Not Inspected, OK=In Compliance, DF= Deficiency	NA	NI	OK	DF

CONTAINER MANAGEMENT 265.1087

Level 1	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process
CC-4 265.1087 Controls		
One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)	One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)	-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)

Level 1		Level 2	Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK	DF
CC-5	265.1087 (N/A) Waste transfer requirements					
No waste transfer requirements apply		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable			
CC-6	265.1087 (OK) Operating requirements					
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)			-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089 (N/A) Inspection requirements					
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)			Inspection requirements are the same as for tanks			
CC-8	265.1087 (N/A) Repair requirements					
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)			Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance			
CC-9	265.1090 (N/A) Recordkeeping requirements					
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service		Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

Comments: All containers not in use were closed/clamped shut.

3M - Medina

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] — Yes ☐ No X N/A ___ RMK#___

2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] — Yes ☐ No X N/A ___ RMK#___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] — Yes ___ No ☐ N/A X RMK#___

4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] — Yes X No ☐ N/A ___ RMK#___

5. Does the SQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes X No___ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes___ No X N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No X N/A ___ RMK#___

   d. Regenerated used batteries? — Yes___ No X N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No X N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes___ No X N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes___ No X N/A ___ RMK#___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] — Yes ☐ No___ N/A X RMK#X

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] — Yes ___ No ☐ N/A X RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] — Yes ___ No ☐ N/A X RMK#___

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] — Yes ___ No ☐ N/A X RMK#___

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] "Spent Batteries" — Yes X No ☐ N/A ___RMK#___

UNIVERSAL WASTE PESTICIDES

8. Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)] — Yes ___ No ☐ N/A X RMK#___

9. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)] — Yes ___ No ☐ N/A ___RMK#___

10. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and -66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)] — Yes ___ No ☐ N/A ___RMK#___

11. If pesticides are stored in a transport vehicle, is it closed, structurally sound and compatible with the pesticide(s)? [3745-273-13(B)(4)] — Yes ___ No ☐ N/A ___RMK#___

12. Are containers, tanks, or transport vehicles that contain universal waste pesticides, labeled with either "Universal Waste Pesticides"or "Waste Pesticides?" [3745-273-14(B)] — Yes ___ No ☐ N/A ___RMK#___

UNIVERSAL WASTE THERMOSTATS

13. Are thermostats that show evidence of leaking, spilling, or damage that could cause leaks, properly contained? [3745-273-13(C)(1)] — Yes ___ No ❑ N/A ✓ RMK#___

14. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)] — Yes ___ No ❑ N/A ___ RMK#___

15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]

    a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-13(C)(2)(a)(b)] — Yes ___ No ❑ N/A ___ RMK#___

    b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)(d)] — Yes ___ No ❑ N/A ___ RMK#___

    c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)] — Yes ___ No ❑ N/A ___ RMK#___

    d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)] — Yes ___ No ❑ N/A ___ RMK#___

    e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)] — Yes ___ No ❑ N/A ___ RMK#___

    f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-13(C)(2)(h)] — Yes ___ No ❑ N/A ___ RMK#___

16. If mercury, clean-up residues, or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-13(C)(3)(a) — Yes ___ No ❑ N/A ✓ RMK#___

a. If the waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52.) [3745-273-13] — Yes ___ No ❑ N/A X RMK#___

b. If the mercury, residues and/or other wastes are not hazardous, are they managed in compliance with applicable law? [3745-273-13(C)(3)(c) — Yes ___ No ❑ N/A ___ RMK#___

17. Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14[D]] — Yes ___ No ❑ N/A ___ RMK#___

UNIVERSAL WASTE LAMPS

18. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] — Yes X No ❑ N/A ___ RMK#___

19. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] — Yes ___ No ❑ N/A X RMK#___

20. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] "Fluorescent lamp Recycling" — Yes X No ❑ N/A ___ RMK#___

NOTE: **Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].** A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

21. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: — Yes X No ___ N/A ___ RMK#___

    a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] — Yes ___ No ☐ N/A X RMK#___

NOTE: Accumulation is defined as date generated or date received from another handler.

22. Is the length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)] — Yes X No ☐ N/A ___ RMK#___

    a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] — Yes___ No___ N/A X RMK#___

    b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] — Yes___ No___ N/A ___ RMK#___

    c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] — Yes___ No___ N/A ___ RMK#___

    d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] — Yes___ No___ N/A ___ RMK#___

    e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] — Yes X No___ N/A ___ RMK#___ Bill of lading shows most recent pick-up date.

    f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] — Yes___ No___ N/A ___ RMK#___

EMPLOYEE TRAINING

23. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] — Yes X No ❑ N/A ___ RMK#___

RESPONSE TO RELEASES

24. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] — Yes ___ No ❑ N/A X RMK#___

25. Is the material released characterized? [3745-273-17(B)] — Yes ___ No ❑ N/A X RMK#___

26. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] — Yes ___ No ❑ N/A X RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a SQUWH self-transports waste, then they must comply with the Universal Waste transporter requirements.***

27. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] — Yes X No ❑ N/A ___ RMK#___

NOTE: ***SQUWHs are prohibited to send waste to any other facility.***

28. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] — Yes ___ No ❑ N/A X RMK#___

29. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] — Yes X No ❑ N/A ___ RMK#___

30. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>: Has not happened

    a. Receive the waste back? [3745-273-18(E)(1)] — Yes___ No___ N/A X RMK#___

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] — Yes___ No___ N/A X RMK#___

31. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss <u>one of the following</u>: — Yes ___ No ❑ N/A X RMK#___

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] — Yes___ No___ N/A ___ RMK#___

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] — Yes___ No___ N/A ___ RMK#___

33. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] — Yes ___ No ❑ N/A ___ RMK#___

34. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] — Yes ___ No ❑ N/A ✓ RMK#___

EXPORTS

35. Is waste being sent to a foreign destination? If so: — Yes___ No X N/A ___RMK#___

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] — Yes ___ No ❑ N/A ___ RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] — Yes ___ No ❑ N/A ___ RMK#___

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] — Yes ___ No ❑ N/A ___ RMK#___

REMARKS

3M - Medina

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

~ESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
QG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.
Safety Equipment Used:

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes ☒ No ☐ N/A ☐
2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] Yes ☒ No ☐ N/A ☐
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes ☒ No ☐ N/A ☐
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes ☒ No ☐ N/A ☐
5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] Yes ☒ No ☐ N/A ☐
6. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes ☐ No ☒ N/A ☐
7. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes ☐ No ☒ N/A ☐
8. Does the generator accumulate hazardous waste? Yes ☒ No ☐ N/A ☐

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes ☐ No ☒ N/A ☐

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
    a. Container that meets 3745-66-70 to 3745-66-77? Yes ☐ No ☐ N/A ☒
    b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes ☐ No ☐ N/A ☒
    c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes ☐ No ☐ N/A ☒
    d. Containment building that meets 3745-256-100 to 3745-256-102? Yes ☐ No ☐ N/A ☒

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11. Does the generator export hazardous waste? If so: Yes ☐ No ☒ N/A ☐
    a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes ☐ No ☐ N/A ☒
    b. Has the generator complied with special manifest requirements? [3745-52-54] Yes ☐ No ☐ N/A ☒
    c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes ☐ No ☐ N/A ☒
    d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes ☐ No ☐ N/A ☒
    e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes ☐ No ☐ N/A ☒

MANIFEST REQUIREMENTS

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes ☒ No ☐ N/A ☐
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes ☒ No ☐ N/A ☐

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes ☒ No ☐ N/A ☐

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes ☐ No ☐ N/A ☒
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes ☒ No ☐ N/A ☐

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes ☐ No ☐ N/A ☒
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes ☐ No ☐ N/A ☒
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes ☒ No ☐ N/A ☒ PW

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes ☒ No ☐ N/A ☐
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ☒ No ☐ N/A ☐
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ☒ No ☐ N/A ☐
25. Does the generator keep records and documentation of:
    a. Job titles [3745-65-16D(1)]? Yes ☒ No ☐ N/A ☐
    b. Job descriptions [3745-65-16D(2)]? Yes ☒ No ☐ N/A ☐
    c. Type and amount of training given to each person[3745-65-16D(3)]? Yes ☒ No ☐ N/A ☐
    d. Completed training or job experience required [3745-65-16D(4)]? Yes ☒ No ☐ N/A ☐
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ☒ No ☐ N/A ☐
28. Does the plan describe the following:
    a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes ☒ No ☐ N/A ☐
    b. Arrangements with emergency authorities [3745-65-52(C)]. THROUGH AOT Yes ☒ No ☐ N/A ☐
    c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes ☐ No ☒ N/A ☐
    d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes ☐ No ☒ N/A ☐

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes ☒ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to Incorporate hazardous waste management provisions hat are sufficient to comply with OAC requirements. [3745-65-52(B)]

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes ☒ No ☐ N/A ☐
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes ☐ No ☒ N/A ☐
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ☐

NOTE: The emergency coordinator shall be throughly familiar with: (a) all aspects of the facility's contingency plan: (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ☐ No ☒ N/A ☐
    a. Was the contingency plan implemented? [3745-65-51(B)] Yes ☐ No ☐ N/A ☒
    b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ☐ No ☐ N/A ☒
    c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes ☒ No ☐ N/A ☐
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
    a. Internal communications or alarm system? [3745-65-32(A)] Yes ☒ No ☐ N/A ☐
    b. Emergency communication device? [3745-65-32(B)] Yes ☒ No ☐ N/A ☐
    c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes ☒ No ☐ N/A ☐
    d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes ☒ No ☐ N/A ☐

NOTE: Verify that the equipment is listed in the contingency plan.

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☒ No ☐ N/A ☐
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes ☒ No ☐ N/A ☐
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes ☒ No ☐ N/A ☐
38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes ☒ No ☐ N/A ☐
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☒ No ☐ N/A ☐
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] FD training and 10 hr/week nurse on site Yes ☒ No ☐ N/A ☐
41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)? Yes ☐ No ☐ N/A ☒

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
    a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐
    b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐
    c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes ☐ No ☐ N/A ☒

e. Containers are closed, in good condition and compatible with wastes stored in them?[3745-52-34(C)(1)(a)] Yes ☒ No ☐ N/A ☐

f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] (The waste oil bucket) Yes ☒ No ☒ N/A ☐

43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes ☐ No ☒ N/A ☐

a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☒

b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☒

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☒ No ☐ N/A ☐

45. Is the accumulation date on each container? [3745-52-34(A)(2)] 2 consolidation drums Yes ☐ No ☒ N/A ☐

46. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☒ No ☐ N/A ☐

b. In good condition? [3745-66-71] Yes ☒ No ☐ N/A ☐

c. Compatible with wastes stored in them? [3745-66-72] Yes ☒ No ☐ N/A ☐

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☒ No ☐ N/A ☐

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes ☒ No ☐ N/A ☐

a. Are inspections recorded in a log or summary? [3745-66-74] Yes ☒ No ☐ N/A ☐

48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ☒ No ☐ N/A ☐

49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes ☐ No ☐ N/A ☒

50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes ☐ No ☐ N/A ☒

51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] Yes ☐ No ☐ N/A ☒

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes ☒ No ☐ N/A ☐

54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☒ No ☐ N/A ☐

55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☒ No ☐ N/A ☐


DANGER
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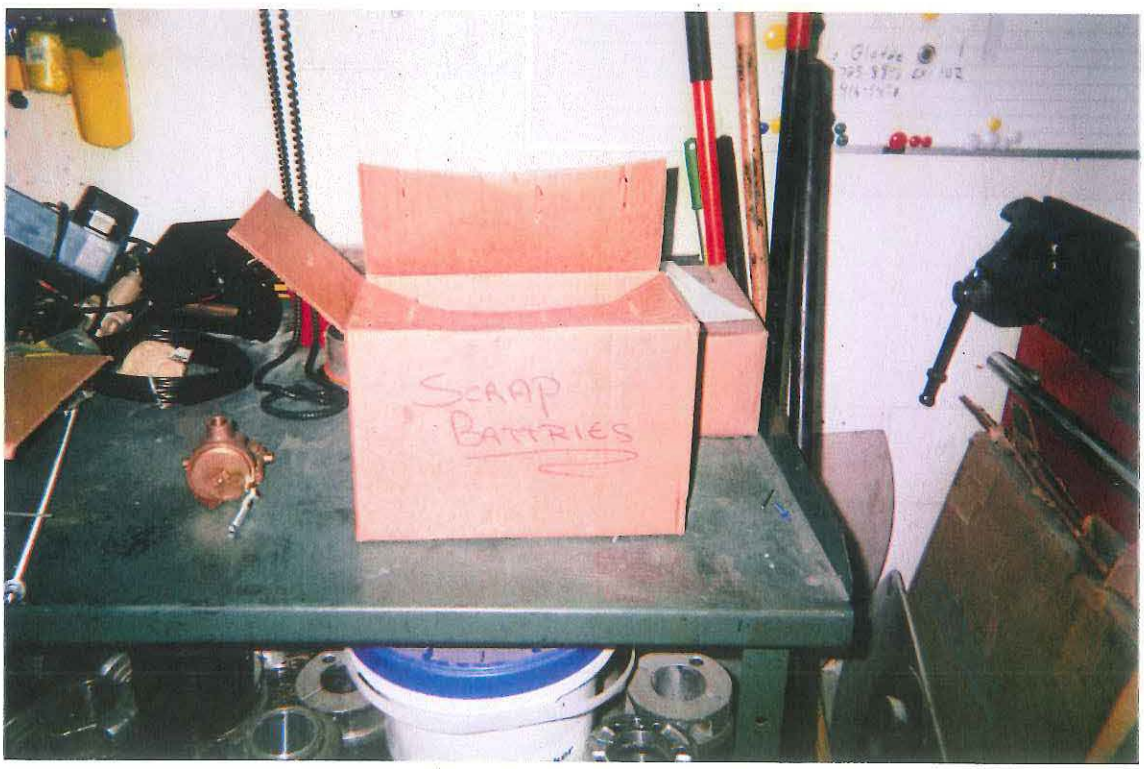
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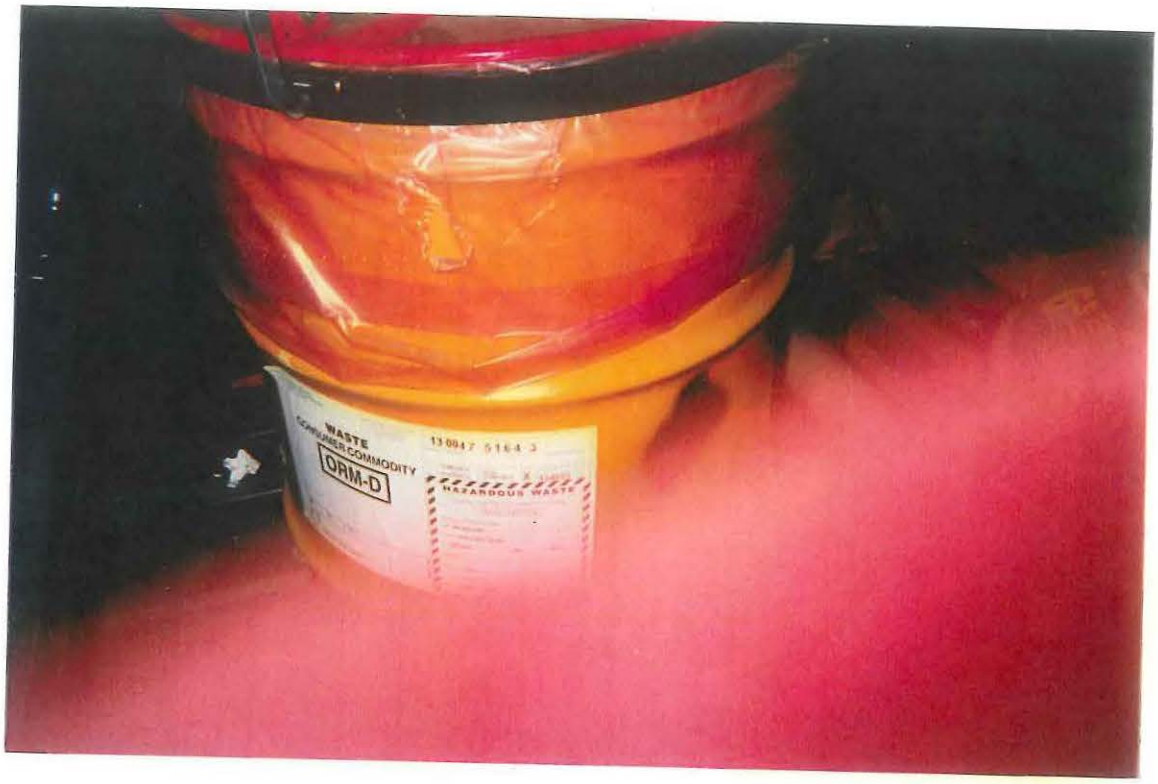
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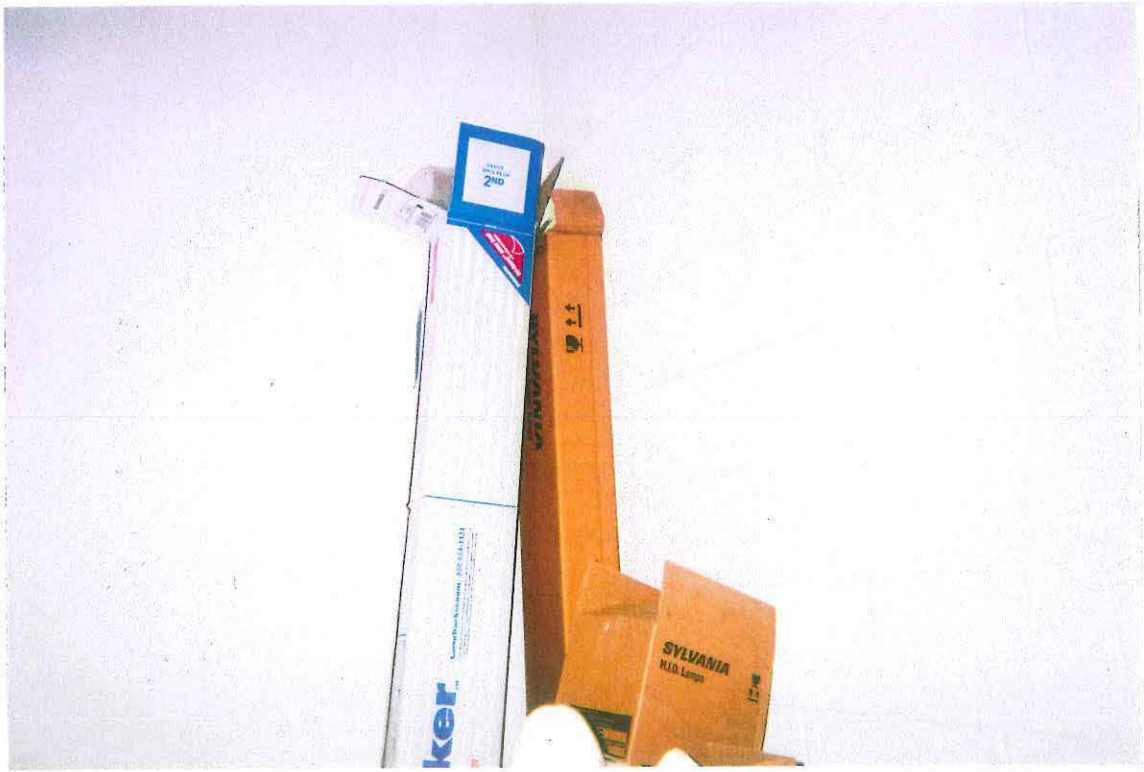
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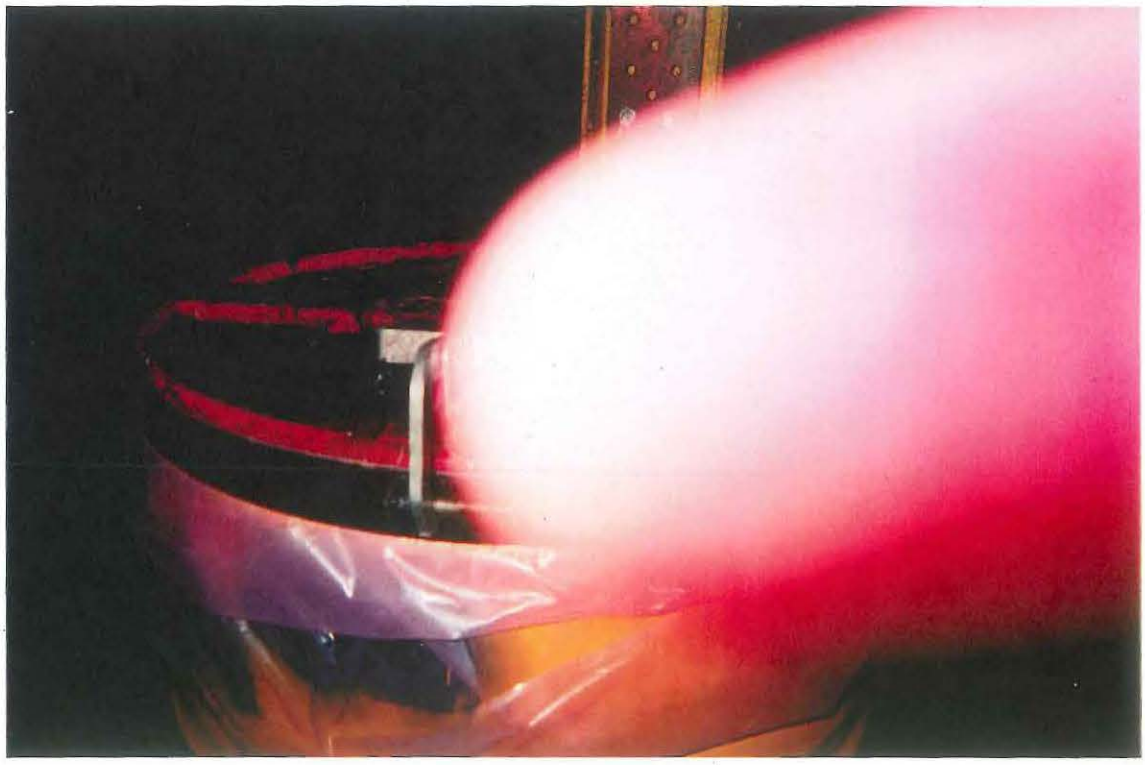

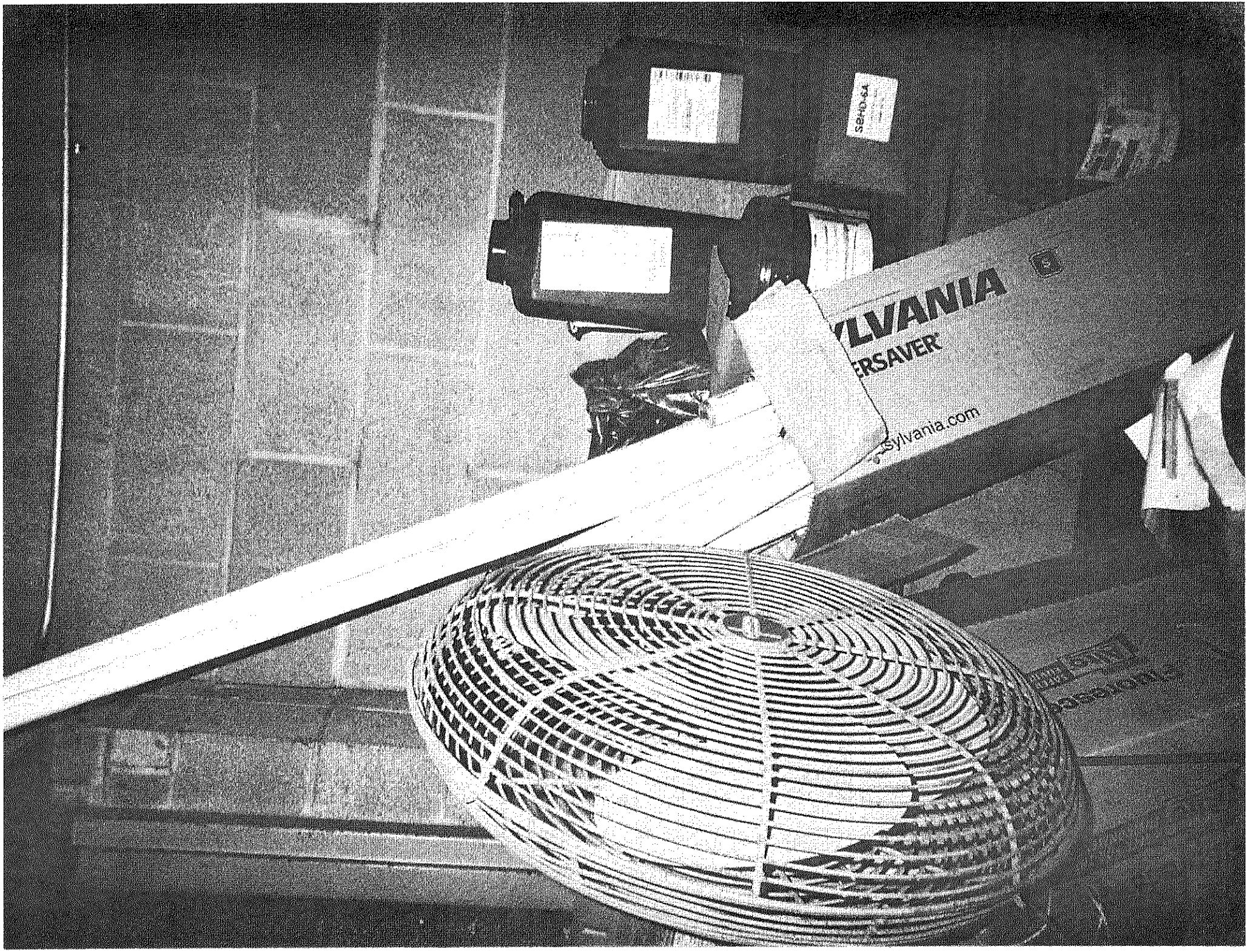
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